

UNITED STATES BANKRTUPCY COURT FOR
THE EASTERN DISTRICT OF MICHIGAN
(DETROIT)

In Re:)
)
CITY OF DETROIT, MICHIGAN,) CASE NO.: 13-53846
) CHAPTER 9
Debtor.) Honorable Steven W. Rhodes
)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned appears as counsel for Robbie Flowers, Michael Wells, Janet Whitson, Mary Washington and Bruce Goldman (“*Flowers* plaintiffs”). Pursuant to Sections 102 and 342 of 11 U.S.C. §§101, *et seq.* (2012) (the “Bankruptcy Code”), Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), request is hereby made that all papers, pleadings, motions, and applications served or required to be served in this case be given to and served upon:

Mami Kato (P74237)
Sachs Waldman, P.C.
2211 E. Jefferson Ave., Ste. 200
Detroit, MI 48207
313-496-9420
Email: mkato@sachswaldman.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and above-specified Sections of the Bankruptcy Code, but also includes without limitation any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and

whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, electronic filing or otherwise filed or made with regard to the above-captioned case and proceedings therein.

This Notice of Appearance and Request for Service of Papers is without prejudice to the *Flowers* plaintiffs' rights, remedies, and claims against other entities or any objection that may be had to the subject-matter jurisdiction of the Court, the Court's jurisdiction over the City of Detroit, or the City of Detroit's eligibility to commence and/or maintain proceedings under Title 11 of the United States Code, and shall not be deemed or construed to submit the *Flowers* plaintiffs to the jurisdiction of the Court. All rights, remedies, and claims are hereby expressly reserved, including without limitation the *Flowers* plaintiffs (i) right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) right to trial by jury in any proceeding so triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) right to seek a change of venue, or (v) any other rights, claims, actions, setoffs or recoupments to which the Trustee is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Trustee expressly reserves.

Respectfully submitted on this 6th day of September 2013.

By: /s/Mami Kato
Mami Kato (P74237)
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CERTIFICATE OF SERVICE

I, Mami Kato, being first duly sworn, hereby certify that on September 6, 2013, I electronically filed **Notice of Appearance and Request for Service of Papers** and this **Certificate of Service** with the Clerk of the Court through the Court's CM/ECF system which will provide notice and service of such documents upon the parties through counsel of record.

SACHS WALDMAN, P.C.

/s/ *Mami Kato*

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Date: September 6, 2013